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RE: *Nevolus v. Deaconess*; Case No. CIV-12-570-D

Counsel,

It was a pleasure speaking with you this afternoon. This letter is to confirm the agreements reached regarding the pending discovery motions.

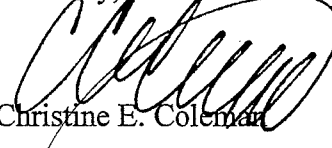
Defendant has agreed to produce the personnel documents at issue in Plaintiff's motion to compel for the following: (1) persons who were employed as medical assistants at the Edmond Family Care Facility, (2) persons at the Edmond Family Care Facility who were disciplined for the same reasons Plaintiff was disciplined, (3) persons at the Edmond Family Care Facility who were terminated for the same reasons Plaintiff was terminated. Defendant has agreed that two weeks is a reasonable time period and will produce these documents no later than June 6, 2013.

Regarding Plaintiff's Motion to Quash Defendant's subpoena of personnel files, Defendant has agreed to limit the scope to documents reflecting beginning and ending dates of employment as well as wage related information.

Regarding Plaintiff's Motion to Quash Defendant's subpoena to Dr. Qureshi and BCBS, we have agreed to limit the scope to December 2010 and January 2011, provided that Plaintiff has not waived any of her objections regarding these documents.

As a result of these agreements, Plaintiff will file a notice to withdraw the pending discovery motions. To the extent Defendant fails to honor these agreements, Plaintiff reserves the right to re-file these motions.

Sincerely,


Christine E. Coleman

cc: Client

